

924-08/MEU  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ROXY INC., MEMPHIS SHIPPING PTE LTD.,  
DYNASTIC MARITIME INC. and SAMANTHA  
SHIPMANGEMENT GROUP,

Petitioners,

- against -

INTERNATIONAL OIL OVERSEAS, INC.,  
MARINA WORLD SHIPPING CORP., GRESHAM  
WORLD SHIPPING CORP., TARAZONA SHIPPING  
CO., S.A., QUOIN ISLAND MARINE WL, BAKRI  
TRADING COMPANY INC., SCHIFF HOLDING  
CO. S.A., and TRANS MEDITERRANEAN  
SHIPPING INC.,

Respondents.

12 Civ. 3625 (LAK)

**NOTICE OF CROSS-MOTION TO  
DISMISS PETITION**

SIRS:

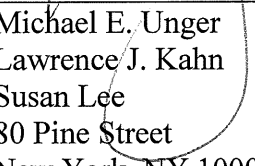
**PLEASE TAKE NOTICE** that Respondents International Oil Overseas, Inc., Marina World Shipping Corp., Gresham World Shipping Corp., Tarazona Shipping Co., S.A., Quoin Island Marine WL, Bakri Trading Company Inc., Schiff Holding Co. S.A., and Trans Mediterranean Shipping Inc. (collectively, "Respondents"), by their attorneys Freehill Hogan & Mahar, LLP, upon the accompanying Memorandum of Law and Declarations of Luis G. Raven, Hassan Mahassni, Hatem Alshreef, Fahid Ghalib, Ahmed Morshedy, Tariq Mousa, Jumma Hussain, Mohammed Osma Adolay, Sameer Sikander and Michael Smith and the pleadings and

proceedings heretofore had herein will move this Court before the Honorable Lewis A. Kaplan, United States District Judge, at the Daniel P. Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York, on behalf of all Respondents, for dismissal of the Petition on *forum non conveniens* grounds and pursuant to Fed.R.Civ.P. Rule 12(b) and for such other, further and different relief as the Court may deem just and appropriate in the premises, including but not limited to an award of costs, attorneys fees and interest.

Dated: New York, New York  
June 18, 2012

FREEHILL HOGAN & MAHAR, LLP  
*Attorneys for Respondents*

By:



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